

# Essential Rules for Depositions in Tort Cases

University of Texas School of Law CLE  
Winning at Deposition: Skills and Strategy  
June 28, 2018

Jim M. Perdue, Jr.  
Perdue & Kidd  
Houston, Texas



1

## What Do I Need?

2





## Think of Priorities

- Level 1 – Essential Liability
  - Defendant Driver
- Level 2 – Supplemental Liability
  - Officer
  - Witnesses
- Level 3 – Damages and Trial
  - Causation Medical Proof
  - Damage witnesses

## Think of Priorities

- **Level 1 – Essential Liability**
  - Risk Manager
- **Level 2 – Supplemental Liability**
  - Employee Witnesses
  - Supervisors
- **Level 3 – Damages and Trial**
  - Treating medical providers
  - Damage witnesses

5

## Think of Priorities

- **Level 1 – Essential Liability**
  - Defendant Care Providers
- **Level 2 – Supplemental Liability**
  - Supervisors for Policy and Procedures
  - Collateral care providers
- **Level 3 – Damages and Trial**
  - Subsequent treaters
  - Adverse Experts

6

Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](http://utcle.org/elibrary)

## Title search: Essential Rules for Depositions in Tort Cases

Also available as part of the eCourse

[2018 Winning at Deposition eConference](#)

First appeared as part of the conference materials for the  
2018 Winning at Deposition: Skills and Strategy session  
"Taking Depositions in Tort Cases"